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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Apr 09, 2024**

SEAN F. MCAVOY, CLERK

8 UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF WASHINGTON  
10

11 UNITED STATES OF AMERICA,

Case No.: 1:22-CR-02112-SAB

12 Plaintiff,

Plea Agreement

13  
14 v.

15 TAYLOR THOMAS RAYNE  
16 SINCLAIR,

17 Defendant.  
18  
19

20 Plaintiff United States of America, by and through Vanessa R. Waldref,  
21 United States Attorney the Eastern District of Washington, and Michael D.  
22 Murphy and Courtney R. Pratten, Assistant United States Attorneys for the Eastern  
23 District of Washington, and Defendant Taylor Thomas Rayne Sinclair  
24 (“Defendant”), both individually and by and through Defendant’s counsel, Andrea  
25 K. George and Juliana M. VanWingerden of the Federal Defenders of Eastern  
26 Washington and Idaho, agree to the following Plea Agreement.  
27  
28

1           1.    Guilty Plea and Maximum Statutory Penalties

2           Defendant agrees to enter a plea of guilty to Count 1 of the Indictment filed  
3 on December 20, 2022, which charges Defendant with Assault with Intent to  
4 Commit Murder, in violation of 18 U.S.C. §§ 113(a)(1), 1153, a Class C felony.

5           Defendant understands that the following potential penalties apply:

- 6               a.    a term of imprisonment of up to 20 years;  
7               b.    a term of supervised release of up to a 3 years;  
8               c.    a fine of up to \$250,000;  
9               d.    restitution; and  
10              e.    a \$100 special penalty assessment.

11          2.    Supervised Release

12          Defendant understands that if Defendant violates any condition of  
13 Defendant's supervised release, the Court may revoke Defendant's term of  
14 supervised release, and require Defendant to serve in prison all or part of the term  
15 of supervised release authorized by statute for the offense that resulted in such term  
16 of supervised release without credit for time previously served on postrelease  
17 supervision, up to the following terms:

- 18               a.    5 years in prison if the offense that resulted in the term of  
19                      Supervised Release is a class A felony,  
20               b.    3 years in prison if the offense that resulted in the term of  
21                      Supervised Release is a class B felony, and/or  
22               c.    2 years in prison if the offense that resulted in the term of  
23                      Supervised Release is a class C felony.

24          Accordingly, Defendant understands that if Defendant commits one or more  
25 violations of supervised release, Defendant could serve a total term of  
26 incarceration greater than the maximum sentence authorized by statute for  
27 Defendant's offense or offenses of conviction.  
28

1           3.     The Court is Not a Party to this Plea Agreement

2           The Court is not a party to this Plea Agreement and may accept or reject it.  
3 Defendant acknowledges that no promises of any type have been made to  
4 Defendant with respect to the sentence the Court will impose in this matter.

5           Defendant understands the following:

- 6           a.     sentencing is a matter solely within the discretion of the Court;  
7           b.     the Court is under no obligation to accept any recommendations  
8                 made by the United States or Defendant;  
9           c.     the Court will obtain an independent report and sentencing  
10                recommendation from the United States Probation Office;  
11           d.     the Court may exercise its discretion to impose any sentence it  
12                deems appropriate, up to the statutory maximum penalties;  
13           e.     the Court is required to consider the applicable range set forth  
14                in the United States Sentencing Guidelines, but may depart  
15                upward or downward under certain circumstances.

16           4.     Waiver of Constitutional Rights

17           Defendant understands that by entering this guilty plea, Defendant is  
18 knowingly and voluntarily waiving certain constitutional rights, including the  
19 following:

- 20           a.     the right to a jury trial;  
21           b.     the right to see, hear and question the witnesses;  
22           c.     the right to remain silent at trial;  
23           d.     the right to testify at trial; and  
24           e.     the right to compel witnesses to testify.

25           While Defendant is waiving certain constitutional rights, Defendant  
26 understands that Defendant retains the right to be assisted by an attorney through  
27 the sentencing proceedings in this case and any direct appeal of Defendant's  
28

1 conviction and sentence, and that an attorney will be appointed at no cost if  
2 Defendant cannot afford to hire an attorney.

3 Defendant understands and agrees that any defense motions currently  
4 pending before the Court are mooted by this Plea Agreement, and Defendant  
5 expressly waives Defendant's right to bring any additional pretrial motions.

6 5. Rule 11 Nature of the Plea Agreement

7 Defendant acknowledges that this Plea Agreement is entered pursuant to  
8 Federal Rule of Criminal Procedure 11(c)(1)(C) ("Rule 11(c)(1)(C)"). Pursuant to  
9 Rule 11(c)(1)(C), the United States and Defendant agree that the appropriate  
10 disposition of the case is no less than 96 months and no more than 168 months in  
11 custody, to be followed by three years of Supervised Release. The United States  
12 and Defendant agree to make those sentencing recommendations to the Court.  
13 Although the United States and Defendant agree to make these recommendations  
14 to the Court pursuant to Rule 11(c)(1)(C), Defendant acknowledges that no  
15 promises of any type have been made to Defendant with respect to the sentence the  
16 Court will ultimately impose.

17 Defendant understands that Defendant may withdraw from this Plea  
18 Agreement if the Court imposes a term of imprisonment of greater than 168  
19 months (14 years) or indicates its intent to do so. Defendant also understands that  
20 the United States may withdraw from this Plea Agreement if the Court imposes a  
21 term of imprisonment of less than 96 months (8 years) or a term of supervised  
22 release of less than three years, or indicates its intent to do so.

23 The United States and Defendant acknowledge that the imposition of any  
24 fine, restitution, or conditions of Supervised Release are not part of the Rule  
25 11(c)(1)(C) nature of this Plea Agreement; that the United States and Defendant  
26 are free to make any recommendations they deem appropriate as to the imposition  
27 of fines, restitution, or conditions of Supervised Release; and that the Court will  
28 exercise its discretion in this regard. The United States and Defendant

1 acknowledge that the Court's decisions regarding the imposition of fines,  
2 restitution, or conditions of Supervised Release will not provide bases for  
3 Defendant to withdraw Defendant's guilty plea or withdraw from this Rule  
4 11(c)(1)(C) Plea Agreement.

5 Defendant acknowledges that if either the United States or Defendant  
6 successfully withdraws from this Plea Agreement, the Plea Agreement becomes a  
7 nullity, and the United States is no longer bound by any representations within it.

8 6. Elements of the Offense

9 The United States and Defendant agree that in order to convict Defendant of  
10 Assault with Intent to Commit Murder, in violation of 18 U.S.C. §§ 113(a)(1),  
11 1153, the United States would have to prove the following beyond a reasonable  
12 doubt.

- 13 a. *First*, the defendant assaulted T.C. by intentionally striking her;  
14 b. *Second*, the defendant did so with the intent to commit murder;  
15 c. *Third*, the defendant is an Indian; and  
16 d. *Fourth*, this happened in Indian Country.

17 7. Factual Basis and Statement of Facts

18 Defendant agrees a jury could find the following facts proof beyond a  
19 reasonable doubt at trial, and these facts constitute an adequate factual basis for his  
20 guilty plea.

21 On or about November 19, 2022, in the Eastern District of Washington, and  
22 within the exterior boundaries of the Yakama Nation, the Defendant, Taylor  
23 Thomas Rayne Sinclair, entered into the property of T.C. through an open gate at  
24 around 7:40 AM. T.C. heard her dogs barking, exited her front door and saw the  
25 Defendant from her front porch. She asked the Defendant if he was looking for  
26 something or she could help him. The Defendant withdrew a folding knife from his  
27 pants pocket, ran up to T.C., and stabbed her several times, including in the face,  
28 abdomen, and hands. T.C. wrestled for the knife and reported to law enforcement

1 that as she was holding on to it, the Defendant placed her in a choke hold and  
2 asked “why don’t you die already, bitch” before beginning to laugh and stating  
3 “you win”. T.C. reported that the Defendant released her from the choke hold and  
4 she ran into the house. She recounted that the Defendant followed her, but she  
5 pushed him back outside and locked the door. T.C. called 911 with the aid of her  
6 minor child. She then took the child into the bathroom and closed and locked the  
7 bathroom door. After closing and locking the door to the residence and hiding in  
8 the bathroom, T.C. heard windows being broken, banging, and a male voice inside  
9 the home.

10 Law enforcement officers arrived to find the Defendant outside of the  
11 residence. The Defendant had blood on him and a cut to one of his fingers. T.C.  
12 was transported for medical care and was found to have suffered multiple stab and  
13 cut wounds, some of which led to an orbital fracture and a collapsed lung, among  
14 other injuries. Law enforcement officers found two windows to T.C.’s residence  
15 broken and the front door also broken and partially off of the hinges. Blood was  
16 found on the front porch, along with the Defendant’s state identity card, which had  
17 blood on it, and blood was found in multiple locations in the house. Laboratory  
18 analysis of swabs taken from the Defendant’s left hand revealed the presence of  
19 blood that lends very strong support for inclusion ( $2.4 \times 10^{20}$  more likely) of T.C.  
20 as a contributor to the DNA from the swab. Laboratory analysis of a folding knife  
21 taken from the Defendant’s left front pant pocket by law enforcement revealed the  
22 presence of blood and very strong support for the inclusion of T.C. ( $9.0 \times 10^{24}$   
23 more likely) and the Defendant ( $1.5 \times 10^{23}$  more likely) as contributors to the two  
24 DNA profiles identified on the blade of the knife. Swabs taken from stains on the  
25 washer of T.C.’s residence, which was located within the residence, and from the  
26 knob of the back door of the residence, revealed the presence of blood and very  
27 strong support for the inclusion of the Defendant ( $9.1 \times 10^{24}$  more likely) as the  
28 contributor to the lone DNA profile identified from the swab. The Defendant is an

1 enrolled member of the Yakama Nation and for that reason and by blood is  
2 considered an "Indian" under Federal law.

3 8. Admissibility of Facts and Prior Statements

4 By signing this Plea Agreement, Defendant admits the truth of the facts set  
5 forth in the Factual Basis section of this Plea Agreement and agrees that these  
6 facts, along with any written or oral statements Defendant makes in court, shall be  
7 deemed usable and admissible against Defendant in any subsequent legal  
8 proceeding, including criminal trials and/or sentencing hearings, under Federal  
9 Rule of Evidence 801(d)(2)(A).

10 Defendant acknowledges, admits, and agrees that by signing this Plea  
11 Agreement, Defendant is expressly modifying and waiving Defendant's rights  
12 under Federal Rule of Criminal Procedure 11(f) and Federal Rule of Evidence 410  
13 with regard to any facts Defendant admits and/or any statements Defendant makes  
14 in court. However, this provision as to "Admissibility of Facts and Prior  
15 Statements" shall not apply should Defendant withdraw from this Plea Agreement  
16 due to the Court imposing a term of imprisonment of greater than 168 months (14  
17 years) or indicating its intent to do so or should the United States withdraw from  
18 this Plea Agreement due to the Court imposing a term of imprisonment of less than  
19 96 months (8 years) or a term of supervised release of less than three years, or  
20 indicating its intent to do so. Should either elect to withdraw from the plea  
21 agreement due to the Court imposing a sentence outside of the range agreed to by  
22 the parties (96 months to 168 months) or due to the Court indicating an intent to  
23 impose a sentence outside of that range, Defendant's waiver of his rights under  
24 Federal Rule of Criminal Procedure 11(f) and Federal Rule of Evidence 410, as  
25 described above, shall not apply. Should Defendant withdraw from the plea  
26 agreement for any other reason, his waiver of his rights under Federal Rule of  
27 Criminal Procedure 11(f) and Federal Rule of Evidence 410 will apply.



1           9.     The United States' Agreements

2           The United States Attorney's Office for the Eastern District of Washington  
3 agrees that at the time of sentencing, the United States will move to dismiss Count  
4 2 of the Indictment.

5           The United States Attorney's Office for the Eastern District of Washington  
6 agrees not to bring additional charges against Defendant based on information in  
7 its possession at the time of this Plea Agreement that arise from conduct that is  
8 either charged in the Indictment or identified in discovery produced in this case,  
9 unless Defendant breaches this Plea Agreement before sentencing.

10          10.    United States Sentencing Guidelines Calculations

11          Defendant understands and acknowledges that the United States Sentencing  
12 Guidelines ("U.S.S.G." or "Guidelines") apply and that the Court will determine  
13 Defendant's advisory range at the time of sentencing, pursuant to the Guidelines.  
14 The United States and Defendant agree to the following Guidelines calculations.

15               a.     Acceptance of Responsibility

16          The United States will recommend that Defendant receive a downward  
17 adjustment for acceptance of responsibility, pursuant to U.S.S.G. § 3E1.1(a), (b), if  
18 Defendant does the following:

- 19                   i.     accepts this Plea Agreement;
- 20                   ii.    enters a guilty plea at the first Court hearing that takes  
21                           place after the United States offers this Plea Agreement;
- 22                   iii.   demonstrates recognition and affirmative acceptance of  
23                           Defendant's personal responsibility for Defendant's  
24                           criminal conduct;
- 25                   iv.    provides complete and accurate information during the  
26                           sentencing process; and
- 27                   v.     does not commit any obstructive conduct.

28          The United States and Defendant agree that at its option and on written



1 notice to Defendant, the United States may elect not to recommend a reduction for  
2 acceptance of responsibility if, prior to the imposition of sentence, Defendant is  
3 charged with, or convicted of, any criminal offense, or if Defendant tests positive  
4 for any controlled substance.

5           b.     No Other Agreements

6           The United States and Defendant have no other agreements regarding the  
7 Guidelines or the application of any Guidelines enhancements, departures, or  
8 variances. Defendant understands and acknowledges that the United States is free  
9 to make any sentencing arguments it sees fit, including arguments arising from  
10 Defendant's uncharged conduct, conduct set forth in charges that will be dismissed  
11 pursuant to this Agreement, and Defendant's relevant conduct.

12           c.     Criminal History

13           The United States and Defendant have no agreement and make no  
14 representations about Defendant's criminal history category, which will be  
15 determined by the Court after the United States Probation Office prepares and  
16 discloses a Presentence Investigative Report.

17           11.    Incarceration

18           The United States and Defendant agree to recommend a sentence of no less  
19 than 96 months and no more than 168 months incarceration.

20           12.    Supervised Release

21           The United States and Defendant each agree to recommend 3 years of  
22 supervised release. Defendant agrees that the Court's decision regarding the  
23 conditions of Defendant's Supervised Release is final and non-appealable; that is,  
24 even if Defendant is unhappy with the conditions of Supervised Release ordered by  
25 the Court, that will not be a basis for Defendant to withdraw Defendant's guilty  
26 plea, withdraw from this Plea Agreement, or appeal Defendant's conviction,  
27 sentence, or any term of Supervised Release.

1 The United States and Defendant agree to recommend that in addition to the  
2 standard conditions of supervised release imposed in all cases in this District, the  
3 Court should also impose the following conditions:

- 4 a. The United States Probation Officer may conduct, upon  
5 reasonable suspicion, and with or without notice, a search of  
6 Defendant's person, residences, offices, vehicles, belongings,  
7 and areas under Defendant's exclusive or joint control.
- 8 b. Defendant shall participate and complete such drug testing and  
9 drug treatment programs as the Probation Officer directs.
- 10 c. Defendant must complete a mental health evaluation and follow  
11 any treatment recommendations of the evaluating professional  
12 which do not require forced or psychotropic medication and/or  
13 inpatient confinement, absent further order of the court.  
14 Defendant shall allow reciprocal release of information between  
15 the Probation Officer and the treatment provider. Defendant  
16 shall contribute to the cost of treatment according to the  
17 Defendant's ability.

18 13. Criminal Fine

19 The United States and Defendant may make any recommendation  
20 concerning the imposition of a criminal fine. Defendant acknowledges that the  
21 Court's decision regarding a fine is final and non-appealable; that is, even if  
22 Defendant is unhappy with a fine ordered by the Court, that will not be a basis for  
23 Defendant to withdraw Defendant's guilty plea, withdraw from this Plea  
24 Agreement, or appeal Defendant's conviction, sentence, or fine.

25 14. Mandatory Special Penalty Assessment

26 Defendant agrees to pay the \$100 mandatory special penalty assessment to  
27 the Clerk of Court for the Eastern District of Washington, pursuant to 18 U.S.C.  
28 § 3013.

1           15.   Restitution

2           The United States and Defendant agree that restitution is appropriate and  
3 mandatory, without regard to Defendant's economic situation, to identifiable  
4 victims who have suffered physical injury or pecuniary loss, pursuant to 18 U.S.C.  
5 §§ 3663A, 3664.

6           Pursuant to 18 U.S.C. § 3663(a)(3), Defendant voluntarily agrees to pay  
7 restitution for all losses caused by Defendant's individual conduct, in exchange for  
8 the United States not bringing additional potential charges, regardless of whether  
9 counts associated with such losses will be dismissed as part of this Plea  
10 Agreement. With respect to restitution, the United States and Defendant agree to  
11 the following:

12                   a.   Restitution Amount and Interest

13           The United States and Defendant stipulate and agree that, pursuant to 18  
14 U.S.C. §§ 3663, 3663A and 3664, the Court should order restitution in an amount  
15 no greater than \$20,000, and that any interest on this restitution amount, if any,  
16 should be waived.

17                   b.   Payments

18           To the extent restitution is ordered, the United States and Defendant agree  
19 that the Court will set a restitution payment schedule based on Defendant's  
20 financial circumstances. 18 U.S.C. § 3664(f)(2), (3)(A). Regardless, Defendant  
21 agrees to pay not less than 10% of Defendant's net monthly income towards  
22 restitution.

23                   c.   Treasury Offset Program and Collection

24           Defendant understands the Treasury Offset Program ("TOP") collects  
25 delinquent debts owed to federal agencies. If applicable, the TOP may take part or  
26 all of Defendant's federal tax refund, federal retirement benefits, or other federal  
27 benefits and apply these monies to Defendant's restitution obligations. 26 U.S.C.  
28 § 6402(d); 31 U.S.C. § 3720A; 31 U.S.C. § 3716.

1 Defendant understands that the United States may, notwithstanding the  
2 Court-imposed payment schedule, pursue other avenues to ensure the restitution  
3 obligation is satisfied, including, but not limited to, garnishment of available funds,  
4 wages, or assets. 18 U.S.C. §§ 3572, 3613, and 3664(m).

5 Nothing in this acknowledgment shall be construed to limit Defendant's  
6 ability to assert any specifically identified exemptions as provided by law, except  
7 as set forth in this Plea Agreement.

8 Until Defendant's fine and restitution obligations are paid in full, Defendant  
9 agrees fully to disclose all assets in which Defendant has any interest or over  
10 which Defendant exercises control, directly or indirectly, including those held by a  
11 spouse, nominee or third party.

12 Until Defendant's fine and restitution obligations are paid in full, Defendant  
13 agrees to provide waivers, consents, or releases requested by the U.S. Attorney's  
14 Office to access records to verify the financial information.

15 d. Notifications and Waivers

16 Defendant agrees to notify the Court and the United States of any material  
17 change in Defendant's economic circumstances (e.g., inheritances, monetary gifts,  
18 changed employment, or income increases) that might affect Defendant's ability to  
19 pay restitution. 18 U.S.C. § 3664(k). Defendant also agrees to notify the United  
20 States of any address change within 30 days of that change. 18 U.S.C.  
21 § 3612(b)(1)(F). These obligations cease when Defendant's fine and restitution  
22 obligations are paid in full.

23 Defendant acknowledges that the Court's decision regarding restitution is  
24 final and non-appealable; that is, even if Defendant is unhappy with the amount of  
25 restitution ordered by the Court, that will not be a basis for Defendant to withdraw  
26 Defendant's guilty plea, withdraw from this Plea Agreement, or appeal  
27 Defendant's conviction, sentence, or restitution order.  
28

1       16.   Payments While Incarcerated

2       If Defendant lacks the financial resources to pay the monetary obligations  
3 imposed by the Court, Defendant agrees to earn money toward these obligations by  
4 participating in the Bureau of Prisons' Inmate Financial Responsibility Program.

5       17.   Additional Violations of Law Can Void Plea Agreement

6       The United States and Defendant agree that the United States may, at its  
7 option and upon written notice to the Defendant, withdraw from this Plea  
8 Agreement or modify its sentencing recommendation if, prior to the imposition of  
9 sentence, Defendant is charged with or convicted of any criminal offense or tests  
10 positive for any controlled substance.

11       18.   Waiver of Appeal Rights

12       In return for the concessions that the United States has made in this Plea  
13 Agreement, Defendant agrees to waive Defendant's right to appeal Defendant's  
14 conviction and sentence if the Court imposes a term of imprisonment consistent  
15 with the terms of this Rule 11(c)(1)(C) Plea Agreement.

16       If the Court indicates its intent to impose a sentence above the Rule  
17 11(c)(1)(C) terms of this Agreement and Defendant chooses *not* to withdraw, then  
18 Defendant: (a) may appeal only Defendant's sentence, but not Defendant's  
19 conviction; (b) may appeal Defendant's sentence only if it exceeds the high end of  
20 the Guidelines range determined by the Court; and (c) may appeal only the  
21 substantive reasonableness of Defendant's sentence.

22       Defendant expressly waives Defendant's right to appeal any fine, term of  
23 supervised release, or restitution order imposed by the Court.

24       Defendant expressly waives Defendant's right to appeal any restitution order  
25 imposed by the Court so long as restitution does not exceed \$20,000.

26       Defendant expressly waives the right to file any post-conviction motion  
27 attacking Defendant's conviction and sentence, including a motion pursuant to 28  
28 U.S.C. § 2255, except one based on ineffective assistance of counsel arising from

1 information not now known by Defendant and which, in the exercise of due  
2 diligence, Defendant could not know by the time the Court imposes sentence.

3 Nothing in this Plea Agreement shall preclude the United States from  
4 opposing any post-conviction motion for a reduction of sentence or other attack  
5 upon the conviction or sentence, including, but not limited to, writ of habeas  
6 corpus proceedings brought pursuant to 28 U.S.C. § 2255.

7 19. Withdrawal or Vacatur of Defendant's Plea

8 Should Defendant successfully move to withdraw from this Plea Agreement  
9 or should Defendant's conviction be set aside, vacated, reversed, or dismissed  
10 under any circumstance, then:

- 11 a. this Plea Agreement shall become null and void;  
12 b. the United States may prosecute Defendant on all available  
13 charges;  
14 c. The United States may reinstate any counts that have been  
15 dismissed, have been superseded by the filing of another  
16 charging instrument, or were not charged because of this Plea  
17 Agreement; and  
18 d. the United States may file any new charges that would  
19 otherwise be barred by this Plea Agreement.

20 The decision to pursue any or all of these options is solely in the discretion  
21 of the United States Attorney's Office.

22 Defendant agrees to waive any objections, motions, and/or defenses  
23 Defendant might have to the United States' decisions to seek, reinstate, or reinitiate  
24 charges if a count of conviction is withdrawn, set aside, vacated, reversed, or  
25 dismissed, including any claim that the United States has violated Double  
26 Jeopardy.



1 Defendant agrees not to raise any objections based on the passage of time,  
2 including alleged violations of any statutes of limitation or any objections based on  
3 the Speedy Trial Act or the Speedy Trial Clause of the Sixth Amendment.

4 20. Integration Clause

5 The United States and Defendant acknowledge that this document  
6 constitutes the entire Plea Agreement between the United States and Defendant,  
7 and no other promises, agreements, or conditions exist between the United States  
8 and Defendant concerning the resolution of the case.

9 This Plea Agreement is binding only on the United States Attorney's Office  
10 for the Eastern District of Washington, and cannot bind other federal, state, or local  
11 authorities.

12 The United States and Defendant agree that this Agreement cannot be  
13 modified except in a writing that is signed by the United States and Defendant.

14  
15 Approvals and Signatures

16 Agreed and submitted on behalf of the United States Attorney's Office for  
17 the Eastern District of Washington.

18 Vanessa R. Waldref  
19 United States Attorney

20  
21   
22 Michael D. Murphy  
23 Assistant United States Attorney

4/9/2024  
Date

24   
25 Courtney R. Pratten  
26 Assistant United States Attorney

4/9/2024  
Date

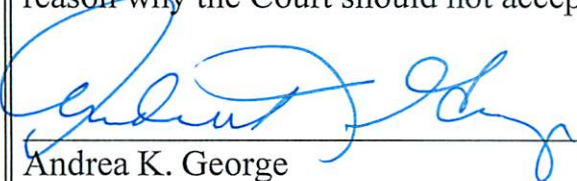


1 I have read this Plea Agreement and I have carefully reviewed and discussed  
2 every part of this Plea Agreement with my attorney. I understand the terms of this  
3 Plea Agreement. I enter into this Plea Agreement knowingly, intelligently, and  
4 voluntarily. I have consulted with my attorney about my rights, I understand those  
5 rights, and I am satisfied with the representation of my attorney in this case. No  
6 other promises or inducements have been made to me, other than those contained  
7 in this Plea Agreement. No one has threatened or forced me in any way to enter  
8 into this Plea Agreement. I agree to plead guilty because I am guilty.


9  
10   
11 TAYLOR THOMAS RAYNE SINCLAIR  
12 Defendant

4-9-24  
Date

13  
14 I have read the Plea Agreement and have discussed the contents of the  
15 agreement with my client. The Plea Agreement accurately and completely sets  
16 forth the entirety of the agreement between the parties. I concur in my client's  
17 decision to plead guilty as set forth in the Plea Agreement. There is no legal  
18 reason why the Court should not accept Defendant's guilty plea.

19   
20 Andrea K. George  
21 Attorney for Defendant

04-09-2024  
Date

22   
23 Juliana M. VanWingerden  
24 Attorney for Defendant

04-09-2024  
Date